

De Vos and Egawa, in combination or alone, fail to teach or suggest the features of claim 1. The Examiner correctly admits that De Vos fails to teach, for example, a massively parallel video server that includes a plurality of processors all having concurrent access to the same set of storage devices for streaming a plurality of video streams. (See Office Action at page 2.) However, the Examiner alleges that it would have been obvious to one of ordinary skill at the time the invention was made to modify De Vos with the teachings of Egawa to arrive at the features of claim 1. The Applicant respectfully disagrees.

Egawa fails to cure the deficiencies of De Vos. In the Office Action, the Examiner relies on Egawa at column 1, lines 29-52 to allegedly cure the deficiencies of De Vos. (Id.) In this passage, Egawa discloses a server that includes a plurality of processing modules. Specifically, the server includes a storage device, a processing device, and a personal computer. (Egawa at col. 1, lines 30-32.) The processing device comprises a plurality of processing modules that receive a request signal and read video data from the storage device. (Egawa at column 1, lines 33-42 and lines 48-50.) The personal computer processes the video data read by the processing device, transforms the video data into a communication format, and transmits the video data through a network. (Egawa at column 1, lines 42-46.) Although the processing device accesses the video data in parallel from the storage device, the video data is provided to the personal computer in a serial fashion since the personal computer does not include a plurality of processors.

Since the processing device and personal computer are connected in series, the personal computer processes the video data in a serial fashion and does not stream the

video data into a plurality of video streams. Instead, the personal computer transmits the video data in serial fashion since the personal computer does not include a plurality of processors. Accordingly, the passage of Egawa cited by the Examiner (Egawa at column 1, lines 29-53) does not teach a massively parallel video server that streams a plurality of video streams, as recited in claim 1.

Moreover, Egawa fails elsewhere to teach the features of claim 1. In particular, Egawa discloses a multimedia server in which processing units access multimedia data stored in input/output units (i.e., storage devices). (See Egawa at column 4, lines 8-26.) When a request for multimedia data is received, a processor control unit analyzes the request to determine which input/output unit stores the requested multimedia data and issues instructions to a predetermined processing unit assigned to that input/output unit. (See Egawa at column 4, lines 30-41.) If multiple portions of the requested multimedia data are stored in different input/output units, then instructions must be transferred between each of the different processing units assigned to those input/output units. (See Egawa at column 4, line 66 through column 5, line 12.) Therefore, no two processing units can concurrently access the same input/output units (i.e., storage devices).

In contrast, claim 1 recites, for example, a massively parallel video server that includes a plurality of processors all having concurrent access to the same set of storage devices for streaming a plurality of video streams. As explained above, since Egawa teaches processing units that do not concurrently access the same input/output units (i.e., storage devices), Egawa does not teach a massively parallel video server

that includes a plurality of processors all having concurrent access to the same set of storage devices for streaming a plurality of video streams, as recited in claim 1.

Accordingly, even if De Vos and Egawa were properly combinable, the combination would still fail to teach or suggest all the features of claim 1 and its respective dependent claims 2-16. Reconsideration and withdrawal of the rejection of claims 1-16 is therefore respectfully requested.

Claim 17 recites a method for delivering interactive multimedia from storage devices to a plurality of subscribers at a subscriber site. A plurality of video streams are streamed from one or more video titles stored in a massively parallel video server that includes a plurality of processors all having concurrent access to the same storage devices. The video streams are then transported to a plurality of clients via a high capacity transport system.

As explained above, De Vos and Egawa, in combination or alone, fail to teach or suggest, for example, a massively parallel video server that includes a plurality of processors all having concurrent access to the same storage devices. Therefore, De Vos and Egawa, in combination or alone, also fail to teach or suggest streaming a plurality of video streams from one or more video titles stored in a massively parallel video server that includes storage devices and a plurality of processors all having concurrent access to the same storage devices, as recited in claim 17.

Accordingly, even if De Vos and Egawa were properly combinable, the combination would still fail to teach or suggest all the features of claim 17 and its respective dependent claims 18-26. Reconsideration and withdrawal of the rejection of claims 17-26 is therefore respectfully requested.

**CONCLUSION**

In view of the foregoing amendments and remarks, Applicant respectfully requests the reconsideration and reexamination of this application and the timely allowance of the pending claims.

Attached hereto is an Appendix with a marked-up version of the changes made to the claims by this amendment. Deletions appear as normal text surrounded by [ ] and additions appear as underlined text.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 07-2339.

Respectfully submitted,

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**APPENDIX TO AMENDMENT**

**IN THE CLAIMS:**

Please amend claim 17 as follows:

17. (Twice Amended) A method for delivering interactive multimedia from storage devices to a plurality of subscribers at a subscriber site, said method comprising the steps of:

streaming a plurality of video streams from one or more video titles stored in a massively parallel video server that includes a plurality of processors all having concurrent access to the same storage devices; and

transporting the video streams to a plurality of clients via a high capacity transport system.